

Attorney for Debtor  
Pia J. North, Esq. #29672  
North Law  
5913 Harbour Park Drive  
Midlothian, VA 23112  
Tel: (804) 739-3700  
Fax: (804) 739-2550  
Help@PiaNorth.com

**United States Bankruptcy Court  
Eastern District of Virginia  
Richmond Division**

In re: Shonda L. White, Debtor  
115 E. Broad Street #101  
Richmond, VA 23219  
Last 4 of SSN: xxx-xx-3724

Case#: 20-34669  
Bruce E. Robinson, Trustee  
Chapter: 7

**MOTION TO EXTEND AUTOMATIC STAY**

Comes Now, Debtor, Shonda L. White, by counsel, Pia J. North, Esq. and states the following in support of this Motion to Extend the Automatic Stay:

1. On, November 23, 2020, the Debtor filed in this Honorable Court a petition for relief under Chapter 7 of the Bankruptcy Code, 11 U.S.C. § 1301 et seq. (the “instant case”). The automatic stay will expire in the instant case on December 23, 2020, unless the Court extends the automatic stay pursuant to 11 U.S.C.362 (c)(3)(A) and (B).
2. Bruce E. Robinson was appointed to serve as Chapter 7 Trustee in this case (the “Trustee”).
3. The Debtor’s bankruptcy history does not indicate a lack of good faith. The Debtor, Shonda L. White filed three previous bankruptcies, however, only two were filed within the last eight years:
  - a. **Chapter 13 Case#: 18-34348** was filed on August 24, 2018 and dismissed on November 20, 2020 for “Failure to make plan payments”. That case was pending within one year of the filing of this instant case, thus triggering the provision of 11 U.S.C. 362(c)(3).
  - b. **Chapter 13 Case#: 17-40856** was filed on June 7, 2017 and dismissed on August 17, 2020 for “Failure to make plan payments”.
  - c. **Chapter 7 Case#: 12-41594** was filed on August 12, 2012. The debtor received a discharge in that matter.

4. The Debtor's financial situation deteriorated when the debtor was forced to take time away from work to care for her mother. She incurred additional unanticipated expenses when she made multiple trips to and from New Jersey. Her mother has now been placed in a nursing home. Additionally, she incurred extra expenses when her unemployed son lived with her. These additional expenses and loss of income caused the debtor to fall behind in her payments to the Chapter 13 Trustee.
5. There has been a change in circumstances in that the debtor no longer has the income to support a Chapter 13 payment plan. The debtor was not eligible to convert the prior case to Chapter 7, however she's now eligible to receive a Chapter 7 discharge in the current case.
6. WHEREFORE, for the foregoing reasons, the Debtor respectfully requests that this Court enter an Order extending the automatic stay under 11 U.S.C. § 362 as to all creditors, as to the Debtor and the Debtor's property, and as to the property of the estate for the duration of this proceeding, or until such time as the stay is terminated under § 362 (c) (1) or (c) (2), or a motion for relief is granted under § 362(d) and for such other and further relief as to the Court shall be deemed appropriate.

Respectfully submitted:  
Shonda L. White

By: /s/ Pia J. North  
Counsel

Attorney for Debtor  
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**NOTICE OF MOTION**

Pia J. North, Attorney for the Debtor having filed papers with the court: Motion to Extend the Automatic Stay.

**Your rights may be affected.** You should read these papers carefully and discuss **them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the relief sought in the objection, or if you want the court to consider your views on the motion, then **on or before December 8, 2020** you or your attorney must: File with the court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
701 E. Broad Street, Room 4000  
Richmond, VA 23219

Office of the U.S. Trustee  
701 E. Broad Street, Room 4304  
Richmond, Virginia 23219

You must also mail a copy to:

Pia J. North  
North Law  
5913 Harbour Park Drive  
Midlothian, VA 23112

Bruce E. Robinson  
P.O. Box 538  
South Hill, VA 23970-0538

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

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**NOTICE**

PLEASE TAKE NOTICE that on **December 9, 2020 @ 12 Noon** or as soon thereafter as is practical, we will appear before the Honorable Kevin R. Huennekens 701 E. Broad Street, Room 5000, Richmond, VA 23219 on the Debtor's Motion to Extend the Automatic Stay.

Shonda L. White and  
BY: /s/ Pia J. North  
Counsel

**Certificate of Service**

I hereby certify that I have on November 24, 2020, served by transmitting a true copy of the foregoing Motion to Extend the Automatic Stay, Notice of Motion and Notice of Hearing electronically through the Court's CM/ECF system or by first class mail, postage pre-paid or email to: Shonda L. White, the Debtor, the Trustee, the United States trustee and to all creditors and parties in interest on the attached mailing matrix

By: /s/ Pia J. North  
Counsel

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**AFFIDAVIT**

I, Shonda L. White declare under penalty of perjury that the information provided in the Motion to Extend the Automatic Stay is true and correct.

1. I filed a Chapter 13 bankruptcy in August 2018. That case was dismissed in November 2020 because my financial situation got worse when my mother became ill and my son moved into my home after losing his job. I could no longer afford to make the Chapter 13 payments and pay my necessary household expenses on my income alone.
2. I filed this Chapter 7 bankruptcy because I cannot afford to pay my debts on my income alone.

WITNESS the following signature and seal on November 23, 2020.

/s/ Shonda L. White  
Shonda L. White

Label Matrix for local noticing

0422-3

Case 20-34669-KRH

Eastern District of Virginia

Richmond

Tue Nov 24 14:54:12 EST 2020

American First Finance

Attn: Bankruptcy

Po Box 565848

Dallas, TX 75356-5848

United States Bankruptcy Court

701 East Broad Street

Richmond, VA 23219-1888

Document Page 6 of 8

American First Finance

7330 W. 33rd Street

Wichita, KS 67205-9370

Anesthesia Consultants

PO Box 14099

Belfast, ME 04915-4034

Capital One Auto Finance

Attn: Bankruptcy

Po Box 30285

Salt Lake City, UT 84130-0285

Capital One Auto Finance

Credit Bureau Dispute

Plano, TX 75025

Capital One Bank

PO Box 30281

Salt Lake City, UT 84130-0281

Capital One/Walmart

Attn: Bankruptcy

Po Box 30285

Salt Lake City, UT 84130-0285

Capital One/Walmart

Po Box 30281

Salt Lake City, UT 84130-0281

Carlyle At Godley Station

7948 Baymeadows Way

Jacksonville, FL 32256-8539

Cash Net USA

175 West Jackson

Suite 1000

Chicago, IL 60604-2863

Century Link

115 Patriots Trail

Hinesville, GA 31313-3431

Certegey Check Services, Inc.

11601 Roosevelt Blvd.

Saint Petersburg, FL 33716-2202

ChexSystems

Attn: Consumer Relations

7805 Hudson Rd., Suite 100

Saint Paul, MN 55125-1703

Comenity Bank/Goody's

PO Box 182789

Columbus, OH 43218-2789

Credit One Bank

PO Box 98873

Las Vegas, NV 89193-8873

DFAS

6760 E. Irvington Pl

Denver, CO 80279

Department of Education/Nelnet

PO Box 9635

Wilkes Barre, PA 18773-9635

(p)DIRECTV LLC

ATTN BANKRUPTCIES

PO BOX 6550

GREENWOOD VILLAGE CO 80155-6550

Equifax Information Services

PO Box 740241

Atlanta, GA 30374-0241

Experian

Dispute Department

P.O. Box 4500

Allen, TX 75013-1311

Fingerhut

Attention: Bankruptcy

6250 Ridgewood Road

Saint Cloud, MN 56303-0820

Genesis FS Card Services

Attn: Bankruptcy

Po Box 4477

Beaverton, OR 97076-4401

Genesis FS Card Services

Po Box 4499

Beaverton, OR 97076-4499

(p)GEORGIA DEPARTMENT OF REVENUE

COMPLIANCE DIVISION

ARCS BANKRUPTCY

1800 CENTURY BLVD NE SUITE 9100

ATLANTA GA 30345-3202

Gold's Gym

1601 Willow Lawn Drive

Unit 3A

Richmond, VA 23230-3431

Grow Financial FCU

P.O. Box 6824

Macdill Air Force Bk/

Tampa, FL 33608-6824

Grow Financial FCU

PO Box 89947

Tampa, FL 33689-0416

Grow Financial FCU

Robert L. Fisher, President

9927 Delaney Lake Drive

Tampa, FL 33619-5071

Internal Revenue Service  
Centralized Insolvency Unit  
P O Box 7346  
Philadelphia, PA 19101-7346

Lanier Collection Agency  
18 Park Of Commerce Blvd  
Savannah, GA 31405-7410

Lanier Collection Agency  
Attn: Bankruptcy  
18 Park Of Commerce Blvd  
Savannah, GA 31405-7410

Liberty Regional Med Center  
462 E G Miles Pkwy  
Hinesville, GA 31313-4000

Memorial Health  
PO Box 102500  
Atlanta, GA 30368-2500

Navient  
Attn: Claims Dept  
Po Box 9500  
Wilkes-Barr, PA 18773-9500

Navient  
Po Box 9635  
Wilkes Barre, PA 18773-9635

Navy Federal Credit Union  
PO Box 3000  
Merrifield, VA 22119-3000

OneMain Financial, Inc.  
CT Corporation System  
4701 Cox Road, Suite 285  
Glen Allen, VA 23060-6808

Onemain Financial  
PO Box 1010  
Evansville, IN 47706-1010

Patriot Loan Company  
319 W. General Screven Way  
Hinesville, GA 31313-3004

Patriot Loan Company  
CT Corporation System  
1201 Peachtree Street NE  
Atlanta, GA 30361-6329

Paypal  
PO Box 105658  
Atlanta, GA 30348-5658

(p)PORTFOLIO RECOVERY ASSOCIATES LLC  
PO BOX 41067  
NORFOLK VA 23541-1067

(p)PROFESSIONAL DEBT MEDIATION  
7948 BAYMEADOWS WAY  
2ND FLOOR  
JACKSONVILLE FL 32256-8539

Receivable Management Inc  
Bankruptcy Dept/Receivables Management S  
7206 Hull Rd Ste 211  
Richmond, VA 23235

Receivable Management Inc  
Pob 17305  
Richmond, VA 23226-7305

Security Finance  
Attn: Bankruptcy  
Po Box 1893  
Spartanburg, SC 29304-1893

Security Finance  
C/o Security Finance  
Spartanburg, SC 29304

Speedy Cash  
3527 N Ridge Rd  
Wichita, KS 67205-1212

Speedy Cash  
P.O. Box #780408  
Wichita, KS 67278-0408

(p)SPRINGLEAF FINANCIAL SERVICES  
P O BOX 3251  
EVANSVILLE IN 47731-3251

Synchrony Bank/Care Credit  
PO Box 965036  
Orlando, FL 32896-5036

Synchrony Bank/Walmart  
Po Box 965024  
Orlando, FL 32896-5024

Telecom Self-reported  
Po Box 4500  
Allen, TX 75013-1311

TransUnion  
P.O. Box 2000  
Chester, PA 19016-2000

TransUnion Consumer Relations  
2 Baldwin Place  
PO Box 1000  
Chester, PA 19016-1000

US Attorney  
919 E Main St, Ste 1900  
Richmond, VA 23219-4622

Urological Assoc of Savannah  
230 East DeRenne Ave  
Savannah, GA 31405-6736

(p)W S BADCOCK CORPORATION  
POST OFFICE BOX 724  
MULBERRY FL 33860-0724

W.S. Badcock Corporation  
CT Corporation System  
289 S Culver Street  
Lawrenceville, GA 30046-4805

Weimark Credit Information  
PO Box 994  
Brick, NJ 08723-0078

(p)BRUCE E ROBINSON  
PO BOX 538  
SOUTH HILL VA 23970-0538

John P. Fitzgerald, III  
Office of the US Trustee - Region 4 -R  
701 E. Broad Street, Ste. 4304  
Richmond, VA 23219-1849

Pia J. North  
North Law  
5913 Harbour Park Drive  
Midlothian, VA 23112-2163

Shonda L. White  
115 E. Broad Street; #101  
Richmond, VA 23219-1792

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

DirecTV  
Attn: Bankruptcy Claims  
P.O. Box 6550  
Englewood, CO 80155

Georgia Department of Revenue  
1800 Century Blvd NE  
Suite 9100  
Atlanta, GA 30345

Portfolio Recovery Assoc  
120 Corporate Blvd Ste 1  
Norfolk, VA 23502

(d)Portfolio Recovery Assoc  
PO Box 41067  
Norfolk, VA 23541

Professional Debt Mediation  
Attn: Bankruptcy  
7948 Baymeadows Way, 2nd Floor  
Jacksonville, FL 32256

Springleaf Financial Services  
547 W Oglethorpe Hwy  
Hinesville, GA 31313

W.S. Badcock Corp  
PO Box 497  
Mulberry, FL 33860

Bruce E. Robinson  
341 Dial 866-769-9218 Code: 7515089  
P.O. Box 538  
South Hill, VA 23970-0538

End of Label Matrix	
Mailable recipients	65
Bypassed recipients	0
Total	65